FILED

97 680 OCT 17 1997

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No. 97-

IN THE

Supreme Court of the United States

OCTOBER TERM, 1997

RUTH V. KOLODZIEJ,

Petitioner,

v.

WARREN SMITH AND ELECTRO-TERM, INC.,

Respondents.

ON PETITION FOR A WRIT OF CERTIORARI TO THE SUPREME JUDICIAL COURT OF THE COMMONWEALTH OF MASSACHUSETTS.

PETITION FOR A WRIT OF CERTIORARI.

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October 17, 1997

BATEMAN & SLADE, INC. BOSTON, MASSACHUSETTS

53 pp

QUESTION PRESENTED

Does Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e-2(a), prohibit adverse employment action based upon an employee's refusal to attend a religious Seminar, regardless of whether the affirmative religious beliefs or practices of the employee preclude such attendance?

PARTIES

The parties are those indicated on the caption of this case. In addition, the Anti-Defamation League and the Institute in Basic Life Principles, Inc. were granted leave to file, and did file, amicus curiae briefs before the court below.

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IN THE SUPREME COURT OF THE UNITED STATES
____ Term, 199-

RUTH V. KOLODZIEJ
Petitioner,

V.
WARREN SMITH AND ELECTRO-TERM, INC.
Respondents.

PETITION FOR A WRIT OF CERTIORARI TO THE SUPREME JUDICIAL COURT OF COMMONWEALTH OF MASSACHUSETTS

Ruth Kolodziej respectfully petitions for a writ of certiorari to review the opinion of the Supreme Judicial Court of the Commonwealth of Massachusetts, affirming the judgment entered in the Hampden County Superior Court.

OPINIONS BELOW

The opinion of the Supreme Judicial Court of the Commonwealth of Massachusetts is published as Kolodziej v. Smith, 425 Mass. 518, 682 N.E.2d 604 (1997) ("Kolodziej II"). It is reproduced as Appendix A to this petition. The Memorandum of Decision and Order of the trial court denying plaintiff's motion to alter or amend the judgment is reproduced as Appendix B to this petition. An earlier opinion of the Supreme Judicial Court in this action is published as Kolodziej v. Smith, 412 Mass. 215, 588 N.E.2d 634 (1992) ("Kolodziej I").

JURISDICTION

28 U.S.C. § 1257(a) confers jurisdiction to review the judgment below by writ of certiorari because Petitioner claims rights under 42 U.S.C. § 2000e-2(a). As is set forth in Kolodziej II, supra, Petitioner first asserted her Title VII claim promptly after the Supreme Judicial Court, in Kolodziej I, remanded this action to Superior Court in 1992 with leave to file an Amended Complaint raising her Title VII claim.

STATUTE AT ISSUE

Section 703(a) of Title VII of the Civil Rights Act of 1964, Pub. L. No. 88-352, codified at 42 U.S.C. § 2000e-2(a), as amended by Section 701(j) of Title VII, Pub. L. No. 92-261, § 2(7) (1972), codified at 42 U.S.C. § 2000e(j), provides as follows:

§ 2000e-2(a): Employer Practices

It shall be an unlawful employment practice for an employer –

> (1) to fail or refuse to hire or discharge any individual, or otherwise to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individual's race, color, religion, sex, or national origin; or
>
> (2) to limit, segregate, or classify his employees or applicants for employment in any way which would deprive or tend to deprive any individual of employment opportunities or otherwise adversely affect his status as an employee, because of such individual's race, color, religion, sex, or national origin.

§ 2000(e)(j): [Definition of "Religion"]

> The term "religion" includes all aspects of religious observance and practice, as well as belief, unless an employer demonstrates that he is unable to reasonably accommodate to an employee's or prospective employee's religious observance or practice without undue hardship on the conduct of the employer's business.

STATEMENT OF THE CASE

The opinions below summarize the basic facts and contain the rulings relevant to the question presented in this petition. A1-16. The Petitioner, Ruth Kolodziej, was demoted by her employer, Respondent Electro-Term, Inc., and its President, Respondent Warren Smith, for refusing to complete a week-long Seminar conducted by the Institute in Basic Life Principles. Electro-Term, a self-proclaimed "Christian company," required all management level employees to attend these annual Seminars, which included prayer and proposed solutions to various interpersonal problems based upon Christian scripture. The Seminar opened and closed with prayers and the singing of hymns.

The Basic Seminar Workbook entered in evidence at trial as Exhibit 3 indicates the religious nature of the Seminar. Pages 2-6 of the Workbook set forth in excess of 1,000 references to New Testament Scripture relevant to the 32 subjects to be covered during the course of the Seminar. These pages are reproduced at Appendix D, pages A21-34, hereto. The subjects included Acceptance of God's Design, Discerning God's Guidance, Basic Steps to Walk in God's Spirit, Sin's Power, Salvation, Way of God, Insights in God's Will, and How to Overcome the Power of Sin. Id. The scriptural references were either quoted or referred to during the Seminar, and participants were encouraged to study the cited verses before each

session. A20-21. The Workbook does not refer to any non-scriptural source material.

Kolodziej, believing that her demotion amounted to constructive discharge, left Electro-Term and brought suit in the Superior Court of the Commonwealth of Massachusetts, Hampden County. She amended her complaint in 1992 to allege that her demotion constituted discrimination in the terms and conditions of employment based upon religion, in violation of 42 U.S.C. § 2000e-2(a). Her action was tried to a jury in March, 1994.

The jury found on special verdict that the Seminar was a "devotional service" which Kolodziej was required to attend. The trial judge's instruction concerning the meaning of "devotional service" is set out at Appendix C hereto, at pages A17-19. In essence, the jury was instructed to consider whether the Seminar involved substantial religious activity.

The trial court, however, determined that in order to recover, Kolodziej had to prove more than adverse employment action based upon her refusal to attend a religious seminar. The trial judge declined to instruct the jury, as Mrs. Kolodziej had requested in her written requests for jury instructions, that "[a]n employer may not require an employee, over her objection, to attend a devotional service." Instead, the verdict was made to turn upon whether Kolodziej was discriminated against "because she refused to comply with a requirement that was contrary to her bona fide personal religious beliefs." A-3. The jury concluded that attendance at the Seminar did not conflict with Kolodziej's bona fide religious beliefs, and judgment entered for the defendant. Id.

When Kolodziej moved to alter or amend the judgment, the trial court again rejected Kolodziej's contention that compulsory religious activity is a per se violation of Title VII. A13-16. The court held that in order to recover under Title VII, a plaintiff who has been fired or demoted for refusing to participate in or be exposed

to compulsory religious activity must demonstrate that her bona fide religious beliefs precluded such participation or exposure. A15-16.

Kolodziej timely appealed the judgment of the trial court, and the Supreme Judicial Court of the Commonwealth of Massachusetts accepted direct appellate review. It affirmed the judgment. Kolodziej v. Smith, 425 Mass. 518, 682 N.E.2d 604 (1997). The court held that a bona fide religious conflict with an employment policy is a necessary element of recovery under Title VII **even if** that employment policy is itself religious in nature:

> . . . the jury found that attendance at the Seminar did not conflict with the plaintiff's bona fide personal religious beliefs and that the defendants did not discharge or otherwise discriminate against the plaintiff because she refused to comply with a requirement that was contrary to her bona fide personal religious beliefs. Thus, **regardless of whether the jury were warranted in finding that the defendants required Kolodziej to attend a "devotional service,"** a matter we need not decide, Kolodziej has failed to prove her case. *Ansonia Bd. of Educ. v. Philbrook, supra* at 65-66.

A6-7 (emphasis added).

The Writ Should be Allowed

I. Whether Title VII permits an employer to take adverse employment action against an employee for refusing to participate in religious activity, regardless of whether such refusal is motivated by the employee's religious practices, observances, or beliefs, is an issue of first impression the determination of which is critically important in establishing the scope of Title VII's prohibition against religious discrimination in the workplace.

The decision of the Supreme Judicial Court cuts off critical workplace religious protection. It treats an employee's right to refrain from religious activity as unworthy of protection in its own right. The Supreme Judicial Court has also implicitly refused in its decision to consider whether religious activity in the workplace, made compulsory by demotion of employees who refuse to participate, constitutes religious discrimination prohibited by 42 U.S.C. § 2000e-2(a), irrespective of whether the employee's objection is religiously motivated, and without reference to 42 U.S.C. § 2000e(j). For these reasons, the issue presented is worth this Court's consideration.

Title VII presumably would bar an employer from refusing to hire prospective employees who are not members of a particular religion or who do not hold particular religious beliefs, and from harassing employees based upon their nonmembership in a religion. In Shapolia v. Los Alamos National Laboratory, 992 F.2d 1033, 1036 (10th Cir. 1993), the court held that discrimination motivated by an employee's status as a non-Mormon was actionable. In Meltebeke v. Bureau of Labor and Industries, 852 P.2d 859, 862 (Ore. Ct. App. 1993), aff'd, 903 P.2d 351 (Ore. 1995), an Oregon appellate court held that harassment by an evangelical Christian employer motivated by fact that the employee was not member of the employer's religion "is discrimination because of that individual's [the employee's] religion.")

Petitioner submits that an employer who demotes an employee for refusing to participate in religious activity approved and sponsored by the employer similarly engages in discrimination based upon that employee's religion, in violation of Title VII.

a. The question presented is one of first impression, and has been obscured by the only two published opinions considering compulsory workplace religious activity.

The Supreme Judicial Court of the Commonwealth of Massachusetts has now held that an employer may, consistent with Title VII, require employees to engage in or be exposed to religious activity as a term or condition of employment, so long as the employees are unable in good faith to articulate an affirmative religious belief or practice that conflicts with such activity. This is an issue of first impression.

There appear to be only two reported judicial decisions in which compulsory devotional services were at issue in the context of a Title VII claim. They are EEOC v. Townley Engineering & Manufacturing Co., 859 F.2d 610 (9th Cir. 1988), cert. denied, 489 U.S. 1077 (1989) and Young v. Southwestern Savings and Loan Association, 509 F.2d 140 (8th Cir. 1975). As the trial court below noted, these cases can be read to suggest that it is a per se violation of Title VII to make attendance at devotionals a compulsory term or condition of employment, but also contain language suggesting that the objecting employee must have a conflict with attendance rooted in the employee's own affirmative religious beliefs or practices.

In fact, neither opinion squarely addressed the question presented here. In both cases it was presumed that the plaintiffs had religious beliefs which would conflict with attendance at devotionals at the commencement of business meetings. In addition, in each case the plaintiff was an atheist. Determining the employment requirement to be religious (a "devotional service") therefore also

proved that the employee's bona fide religious beliefs conflicted with that requirement. The Young and Townley cases tend to obscure the issue presented in this case.

The potential for confusion in applying Young and Townley is evident in the Supreme Judicial Court's two opinions in this case. In Kolodziej I, the court, citing Young and Townley, stated in dicta that

> [w]e have no doubt that an employer's requirement of an employee's attendance at devotional services at which prayer is offered would constitute unlawful compulsion to participate in religious activity.

412 Mass. at 220-221, 588 N.E.2d. at 658. Yet, in Kolodziej II, the Court held that it is nevertheless still necessary, in order to recover under Title VII, to prove a bona fide religious conflict with attendance at a religious Seminar.

Neither of these propositions is entirely correct. First, although Petitioner agrees with the Kolodziej I court that compulsory religious activity is unlawful and discriminatory, it is not clear that the holdings in Young and Townley are so broad. Second, neither Young nor Townley can reasonably be said to hold that Title VII prohibits compulsory religion as a condition of employment **only** when an employee's objection to attending is grounded in his or her own affirmative religious beliefs.

Accepting this case for review, and deciding the issue presented, will clarify the actual and potential confusion arising out of Young and Townley.

b. The decision of the Massachusetts Supreme Judicial Court leaves employees vulnerable to compulsory religion in the workplace, and to the infringement of important religious freedoms protected by the First Amendment.

Congress enacted and amended Title VII to ensure individuals the same protection in employment as they enjoy in relation to the government by virtue of the First Amendment to the Constitution of the United States. As Senator Randolph of West Virginia noted in support of the passage of the 1972 amendment to the Civil Rights Act, "I think in the Civil Rights Act we thus intended to protect the same rights in private employment as the Constitution protects in Federal, State or local governments." Cooper v. General Dynamics, Convair Aerospace Div., 533 F.2d 163, 168 n.9 (5th Cir. 1976) (quoting 118 Cong. Rec. § 228 (1972)), cert. denied, 433 U.S. 908 (1977).

In response to the holding in Dewey v. Reynolds Metal Co., 429 F.2d 324, 330 and 335 (6th Cir. 1970), aff'd by equally divided Court, 402 U.S. 689 (1971), Congress amended Title VII to make clear that it prohibits the failure of an employer reasonably to accommodate the religious practices of an employee where to do so would not involve undue hardship in the operation of the business. 42 U.S.C. § 2000e(j). See Ansonia Bd. of Educ. v. Philbrook, 479 U.S. 60, 63, n.1 (1986) and Trans World Airlines v. Hardison, 432 U.S. 63, 72-74 (1977).

One individual right protected by the religion clauses of the First Amendment is freedom from religion:

> . . . just as the right to speak and the right to refrain from speaking are complementary components of a broader concept of individual freedom of mind, so also the individual's freedom to choose his own creed is the counterpart of his right not to accept the creed established by the majority.

Wallace v. Jaffree, 472 U.S. 38, 52 (1985). Such freedom is "the central liberty that unifies the various Clauses of the First Amendment." Id. at 50-51. Similarly,

> Title VII has been interpreted to protect against requirements of religious conformity and as such protects those who refuse to hold, as well as those who hold, specific religious beliefs.

Shapolia v. Los Alamos Nat'l Lab., 992 F.2d 1033, 1036 (10th Cir. 1993).

The Supreme Judicial Court's holding lays this "central liberty" open to attack in the workplace. Determining whether such a holding can be squared with Title VII's ban upon religious discrimination is for that reason alone a worthwhile endeavor.

c. The decision of the Massachusetts Supreme Judicial Court ignores the discriminatory purposes and effects of compulsory religion in the workplace.

In holding that Title VII recovery requires an employee to show religiously motivated conflict with a workplace prayer requirement, the Supreme Judicial Court ignores the discriminatory effects of the requirement itself. Yet, it seems undeniable that the effect of compulsory religious activity in the workplace would tend to be the hiring and advancement of adherents at the expense of nonadherents. If a core objective of Title VII is to discourage religion-based hiring, promotion, demotion, and firing, Petitioner submits that it is certainly worth considering whether compulsory workplace religious activity is compatible with that objective.

Application of each element of the order of proof set out in Ansonia Board of Education v. Philbrook, 479 U.S. 60 (1986) is unnecessary and inappropriate in a Title VII case involving

employment requirements that are religious in nature. The Supreme Judicial Court erred in requiring its application in this case.

The Ansonia order or proof was developed for cases in which an employee claims religious conflict with a facially neutral job requirement, such as scheduling. In Ansonia, the Court considered only the scope of the employer's duty to accommodate religious practice and observance within the meaning of § 701(j) of Title VII, 42 U.S.C. § 2000e(j). 479 U.S. at 66-67. As Justice Stevens commented, concurring in part and dissenting in part, this issue arises only when "'a neutral rule of general applicability conflicts with the religious practices of a particular employee.'" 479 U.S. at 76, quoting Hardison, supra at 87 (Marshall, J., dissenting).

In such cases, because the work requirement is neutral, the inference of discrimination exists only if the employee's conflict is truly religious in nature. Cf. Frazee v. Illinois Employment Div., 494 U.S. 829, 833 (1990) (in considering Free Exercise claims involving neutral state laws, "[s]tates are clearly entitled to assure themselves that there is an ample predicate [the religious nature of a conflicting belief] for invoking the Free Exercise Clause").

This is not the case when the term or condition of employment is itself religious in nature. The religiosity of the job requirement, coupled with its compulsory nature, raises an inference of discrimination at least as strong as the failure reasonably to accommodate religious practices of employees that burden compliance with neutral job requirements.

The elements of proof in a Title VII case are not intended to be "rigid, mechanized or ritualistic." Furnco Constr. Co. v. Waters, 438 U.S. 567, 577 (1978). The order or proof "is merely a sensible, orderly way to evaluate the evidence in light of common experience as it bears on the critical question of discrimination." Id. at 577. Elements' of proof are derived based upon a common-sense assessment of what actions of an employer, otherwise unexplained,

are more likely than not based upon an attribute of the employee which puts him or her in a protected class, i.e., sex, race, color, national origin or, in this case, religion. Teamsters v. United States, 431 U.S. 324, 358 (1977) (interpreting McDonnell Douglas Corp. v. Green, 411 U.S. 792 (1973)).

The courts below violated these principles in rigidly adhering to the Ansonia proof requirements when the religious nature of the employment requirement supports, and Petitioner contends compels, the inference of discrimination. In reviewing this case, the Court can fashion an appropriate order or proof which acknowledges the potential for religious discrimination arising from compulsory religion in the workplace.

d. The failure of the courts below to acknowledge the religious nature of the Institute in Basic Life Principles Seminar should not prevent granting the writ.

Both the trial court and the Supreme Judicial Court refused to acknowledge that the Basic Life Principles Seminar is a "devotional service," notwithstanding the jury's contrary finding. This refusal undoubtedly stems from the Supreme Judicial Court's comment in Kolodziej I that the Seminar "was in no sense a devotional service." 412 Mass. at 220-221.

The attitude of the courts below regarding this issue should not affect the decision whether to grant this petition. The Supreme Judicial Court did not find the jury's verdict on this point to be unsupported or unreasonable, and accepted it as valid for purposes of its holding.

Moreover, the evidence at trial clearly supported the jury's determination that the Seminar was a "devotional service." The view that the Seminar does not involve substantial religious activity is in fact difficult to fathom in light of the evidence presented at trial,

including the Seminar Workbook. The courts below accepted that each day of the Seminar began and concluded with a prayer and involved the singing of hymns. The Seminar's teachings are based entirely upon scripture, and espouse Christian principles as such. The courts below did not even attempt to justify their view that the Seminar was not a devotional service, other than by reference to the above-quoted comment in Kolodziej I, which came without explanation as well. The jury's determination that the Seminar was a devotional service adequately frames the question presented.

CONCLUSION

Whether Title VII permits compulsory religious activity as a term or condition of employment is an issue of first impression, the determination of which will define important aspects of religious freedom, assist lower courts in trying such cases sensibly and fairly, and, it is hoped, emphasize to courts the need to apply orders of proof in Title VII cases that best inform the ultimate issue of discrimination in the circumstances presented.

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Dated: October 17, 1997

APPENDIX A

RUTH V. KOLODZIEJ vs. WARREN SMITH & another. n1
SJC-07202
SUPREME JUDICIAL COURT OF MASSACHUSETTS

425 Mass. 518; 682 N.E.2d 604; 1997 Mass. LEXIS 178
May 5, 1997, Argued
July 21, 1997, Decided

PRIOR HISTORY:

Hampden. Civil action commenced in the Superior Court Department on August 17, 1988. After review by this court, 412 Mass. 215 (1992), the case was tried before James P. Dohoney, J. The Supreme Judicial Court granted an application for direct appellate review.

DISPOSITION: Judgment affirmed.

SYLLABUS: Civil Rights, Availability of remedy, Termination of employment. Constitutional Law, Freedom of religion. Employment, Termination, Discrimination.

COUNSEL: Wendy Sibbison for the plaintiff.

Douglas R. Dagarin (Robert G. Caprera with him) for the defendants.

The following submitted briefs for amici curiae:

Steven W. Kasten, Doron F. Ezickson, Sally J. Greenberg & Ruth L. Lanser, Steven Freeman & Harlan A. Loeb, of New York, for the Anti-Defamation League.

n1 Electro-Term, Inc.

Robert J. Barth, of Illinois, & Robert G. Caprera, for the Institute in Basic Life Principles, Inc.

JUDGES: Present: Wilkins, C.J., Abrams, Lynch, O'Connor, Greaney, Fried, & Marshall, JJ.

OPINION BY: O'CONNOR

OPINION: [*518] O'CONNOR, J. This case is before us for the second time. The plaintiff brought an action against the defendants, Electro-Term, Inc., and its president, Warren Smith, after she was punished for [*519] refusing to attend a company-mandated seminar. The defendants were granted directed verdicts and Kolodziej appealed. This court affirmed the judgment for the defendants, Kolodziej v. Smith, 412 Mass. 215, 588 N.E.2d 634 (1992) (Kolodziej I), but, in light of a then recent decision by the United States Supreme Court, Yellow Freight Sys., Inc. v. Donnelly, 494 U.S. 820, 825, 108 L. Ed. 2d 834, 110 S. Ct. 1566 (1990), holding that State courts may adjudicate claims brought under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. @@ 2000e et seq. (1988) (Title VII), we remanded the case to give Kolodziej an opportunity to amend her complaint to include that Federal claim. Kolodziej I, 412 Mass. at 222-223.

Kolodziej's amended complaint, which was based on the same underlying facts as her initial complaint, alleged religious discrimination in violation of Title VII. The case was tried to a jury in the Superior Court. Ten written questions, agreed on by the parties, were submitted to the jury. The first four questions and the jury's answers were as follows:

"1. Did the Defendants require Plaintiff to attend a 'devotional service'? A. Yes X No

"2. Did the attendance at the seminar conflict with the Plaintiff's bona fide personal religious beliefs? A. Yes No X.

"If the answers to both question no. 1 and question no. 2 are 'NO', please date and sign the form. If the answer to either question no. 1 or question no. 2 is 'YES', please continue.

"3. Did the Plaintiff give notice to the Defendants that attendance at the seminar conflicted with her bona fide personal religious beliefs?

"If the answer is 'NO', please date and sign this form. If the answer is 'YES', please continue. A. Yes X No

"4. Did the Defendants discharge or otherwise discriminate against the Plaintiff because she refused to comply with a requirement that was contrary to her bona fide personal religious beliefs? A. Yes No X.

"If the answer is 'NO', please date and sign this form. If the answer is 'YES', please continue."

[*520] In light of the jury's answer to question 4, the jury did not answer questions 5 through 10. Judgment for the defendants was entered in the Superior Court. Kolodziej appealed and we granted her application for direct appellate review. We now affirm that judgment.

In Kolodziej I, supra at 217, we stated:

"The jury would have been warranted in finding the following facts. Electro-Term, Inc., manufactures and sells electrical connectors. Begun in 1976 by the defendant Smith, the company considers itself a 'Christian company.' It espouses Christian principles and offers a weekly Bible reading session to

employees at which attendance is voluntary. In 1988, when the plaintiff's legal action was commenced, Electro-Term, Inc., employed approximately forty-one people. The plaintiff, a Roman Catholic, was initially hired as a temporary employee by the company in August, 1987. In October, 1987, she was hired permanently and promoted to the position of controller, a management position. At all times she was an employee at will.

"Smith considered it very beneficial for the company's employees annually to attend a week-long seminar put on by the Institute in Basic Life Principles entitled 'Institute in Basic Youth Conflicts.' Attendance was mandatory for management level employees. The seminar offered instruction in several areas including the resolution of conflicts in interpersonal relationships, dealing with anger, and responding to authority. The seminar was nondenominational, but it used references to Scriptural texts to reinforce and illustrate its teachings."

At retrial, the jury would have been warranted in finding the same facts. In addition, at the retrial, the plaintiff, by her own testimony, presented the following evidence:

Q.: "Mrs. Kolodziej, when you went to the seminar on July 13 and 14, how did the seminar open?"

A.: "Started with a prayer."

Q.: "How did it close?"

A.: "Ended with a prayer."

Q.: "Were there any hymns sung during the course of the seminar?"

A.: "Yes, there were."

Q.: "Do you remember any of them?"

A.: "No, they're not familiar to me."

Q.: "Were they familiar at the time?"

A.: "Nothing I ever heard before."

As the trial judge observed in his memorandum of decision regarding the plaintiff's motion to amend the judgment or in the alternative grant a new trial, the evidence was "very scanty" on the issue whether the seminar constituted a devotional service and was "basically limited to statements that there was an opening prayer and possibly a closing prayer and hymns. There [was] no evidence as to the extent, duration, or content of the prayer." The judge concluded that Kolodziej had "failed . . . to show that any change in the evidence from the first trial [was] sufficient to make this seminar a devotional service."

The plaintiff testified at the second trial that certain aspects of the seminar's second day of teaching offended her. Specifically, she objected to a portion of the seminar that day which employed an illustrated diagram portraying God's "plan" for the family. In the diagram, God was depicted at the top with man below God and woman below man. Scriptural texts were referenced in support of this "plan." The following day, Kolodziej informed Smith that she did not wish to continue to attend the seminar. Kolodziej testified, as did the defendant Smith, that at first Kolodziej told Smith that she could not understand how the seminar related to her work, and that she was needed at home to take care of her granddaughter and her ailing mother. Kolodziej also testified to having told Smith that the seminar's contents were contrary to her religious belief. Smith informed Kolodziej that if

she did not attend the seminar she could not be a manager in his company but could retain employment in a non-managerial position. Kolodziej refused further to attend the seminar, was immediately relieved of her management responsibilities and consequently walked off the job.

Since the appeal before us concerns only a claim of religious discrimination under Title VII, our analysis is governed by Federal law. Title VII forbids an employer: "to . . . discharge an individual, or otherwise to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individual's . . . religion." 42 U.S.C. @ 2000e-2(a)(1). In order to establish a prima facie case of workplace religious discrimination under Title VII, a plaintiff must prove that (1) a bona fide religious belief of the employee conflicted with an employment policy; (2) the employee informed the employer of the conflict; and (3) the employee was penalized in some way because of the conflict. Ansonia Bd. of Educ. v. Philbrook, 479 U.S. 60, 65-66, 93 L. Ed. 2d 305, 107 S. Ct. 367 (1986).

The judge instructed the jury as follows: "Now, religious beliefs include moral or ethical beliefs as to what is right or wrong which are sincerely held with the strength of religious views." The instruction comports with relevant law. See Welsh v. United States, 398 U.S. 333, 26 L. Ed. 2d 308, 90 S. Ct. 1792 (1970); United States v. Seeger, 380 U.S. 163, 13 L. Ed. 2d 733, 85 S. Ct. 850 (1965).

In response to the second and fourth written questions put to them, the jury found that attendance at the seminar did not conflict with the plaintiff's bona fide personal religious beliefs and that the defendants did not discharge or otherwise discriminate against the plaintiff because she refused to comply with a requirement that was contrary to her bona fide personal religious

beliefs. Thus, regardless of whether the jury were warranted in finding that the defendants required Kolodziej to attend a "devotional service," a matter we need not decide, Kolodziej has failed to prove her case. See Ansonia Bd. of Educ. v. Philbrook, 479 U.S. at 65-66.

Judgment affirmed.

APPENDIX B

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss.

SUPERIOR COURT
CIVIL ACTION
NO. 88-1547

RUTH V. KOLODZIEJ
Plaintiff

vs.

WARREN SMITH AND ELECTRO TERM, INC.
Defendants

MEMORANDUM OF DECISION AND ORDER ON
PLAINTIFF'S MOTION TO
ALTER OR AMEND JUDGMENT OR, IN THE
ALTERNATIVE, MOTION FOR NEW TRIAL

The Plaintiff commenced this action by alleging certain causes of action including violations of General Laws, Chapter 12, Section 11I, and violations of General Laws, Chapter 151B, Section 4. The case was originally tried to a jury in 1990. This trial resulted in a judgment for the Defendants on a Motion for Required Finding. An appeal was taken to the Appeals Court. The case was thereafter transferred to the Supreme Judicial Court. The Supreme Judicial Court upheld the action of the trial justice in allowing the Defendants' Motion for a Required Finding. See Kolodziej v. Smith, 412 Mass. 215 (1992).

The Plaintiff subsequently amended her Complaint by adding Count VI to allege a violation of 42 U.S.C. 2000e (Title VII of the Civil Rights Act of 1964). The case thereafter came on for trial on March 11, 1994. The case was tried to a jury.[1/] The parties agreed that the case would be submitted to the jury by special questions. The Plaintiff requested the following special questions be asked of the jury:

1. Was the seminar, Institute of Basic Youth Conflicts, a devotional service?

2. Did the company policy of Electro Term mandating Mrs. Kolodziej's presence at the seminar conflict with her personal religious beliefs?

3. Did the content of the seminar conflict with Mrs. Kolodziej's personal religious beliefs?

The Plaintiff also requested other questions relative to accommodations, reckless indifference, and monetary damages. The Plaintiff also submitted requests for instructions to the jury

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1/ At the time of trial there was some doubt as to whether there was a right to a jury trial. Subsequent to trial the United States Supreme Court decided Landgraff v. U.S.I. Film Products, 511 U.S.____(1994) which indicates that there was no right to a jury trial. Dicta in Whalen v. NYNEX Information Services, Inc., 36 Mass. App. Ct. 148 (1994) indicates that it is not reversible error submit a discrimination case to a jury even though there is no right to a jury trial. See also Dalis v. Buyer Advertising, Inc., 418 Mass. 220 (1994) fn.7. Most importantly, the Plaintiff does not advance this as a reason for a new trial.

which included

6. An employer may not require an employee, over her objection, to attend a devotional service.

After conferences with counsel the Court submitted the following questions to the jury:

1. Did the Defendants require Plaintiff to attend a "devotional service"?
   Yes __ No __

2. Did the attendance at the seminar conflict with the Plaintiff's bona fide religious beliefs?
   Yes __ No __

If the answers to <u>both</u> question no. 1 and question no. 2 are "NO", please date and sign the form. If the answer to either question no. 1 or question no. 2 is "YES", please continue.

3. Did the Plaintiff give notice to the Defendants that attendance at the seminar conflicted with her bona fide personal religious beliefs?

   Yes __ No __

4. Did the Defendants discharge or otherwise discriminate against the Plaintiff because she refused to comply with a requirement that was contrary to her bona fide personal religious beliefs?

Yes __ No __

If the answer to (sic)"NO", please date and sign this form. If the answer is "YES, please continue.

The Plaintiff did not object to the form of the questions or to the directional instructions.[2/] The jury answered YES to Question No. 1, NO to Question No. 2, YES to Question No. 3, and NO to Question No. 4. Pursuant to the instructions the jury then stopped answering questions and returned their verdict. After the verdict was read and recorded but before the jury was discharged the Court inquired of counsel for the Plaintiff if there was anything further and received a negative response.[3/] The Court thereafter entered judgment for the Defendants based upon the answers of the jury.

2/ The Court is making this statement based upon its own recollection and without the aid of transcript.

3/ Once again, the statement is based upon the recollection of the Court without the aid a transcript. By agreement he verdict was actually received by counsel who assisted in the trial but who was not lead counsel.

Plaintiff now brings this motion and requests that judgment be entered for the Plaintiff on the basis of the answer of the jury on Question No. 1 that the Defendants required the Plaintiff to attend a "devotional service." and that a hearing be scheduled on damages. Alternatively, the Plaintiff requests a new trial because the verdict is against the weight of the evidence and contrary to law. The essential underpinnings to the Plaintiff's motion is her assertion that the mere requirement of attendance at a devotional service violates 42 U.S.C. 2000e and triggers a right to recovery and that the answer of the jury to Question No. 4 is contrary to the evidence and against the undisputed evidence. For discussion purposes the Court will deal with the second contention first.

DISCUSSION

I. IS THE ANSWER TO QUESTION NO. 4 AGAINST THE WEIGHT OF THE EVIDENCE?

Insofar as this Motion relates to Question No. 4, the answer of the jury is consistent with its other answers and well grounded in the evidence. The jury found in Question No. 2 that the attendance at the seminar did not conflict with the bona fide religious beliefs of the Plaintiff. Question No. 4 simply asks if she was discriminated against because of a refusal to comply with a requirement that was contrary to her bona fide religious beliefs. The common thread is that Plaintiff failed to convince the jury that attendance at the seminar conflicted with her bona fide religious beliefs. The only evidence advanced by the Plaintiff on this point was her own testimony. She produced no expert or member of the clergy to show attendance at the seminar conflicted with Roman Catholic dogma. She also admitted that since this time she has attended services outside the Roman Catholic religion. Moreover, the clear thrust of Plaintiff's testimony was that she greatly offended by content of the seminar that could be interpreted to espouse the view that the male is the head of the household and that the female is somehow subservient. Thus, the answer of the jury to Question No. 4 is

entirely consistent with the view that they simply did accept the proposition that attendance at the seminar conflicted with her "bona fide personal religious beliefs."

II. IS PLAINTIFF ENTITLED TO RECOVERY BASED SOLELY ON THE ANSWER TO QUESTION NO. 1?

A more significant issue is presented with respect to the Plaintiff's contention that mere requirement of attendance at a "devotional service" entitles her to recovery even if it does not conflict with her religious beliefs. She cites EEOC v. Townlev Engineering & Mfg Co. 859 F.2d 610 (9th Cir. 1988), Young v. Southwestern Savings and Loan Assoc., 509 F.2d 140 (5th Cir. 1975) and this case Kolodziej v. Smith, 412 Mass. 215 (1992) to support her contention. There is clearly language in these cases supporting her contention. However, the Court is going to deny the Motion for three reasons.

A. DEVOTIONAL SERVICE

There is grave doubt that the seminar here was a "devotional service." The Supreme Judicial Court stated in Kolodziej, supra, at 211

> However, the seminar at here was in no sense a a devotional service despite the fact that it promoted Scriptural passages as support for the lessons it sought to promote.

The parties have advised the Court that our trial contained more evidence supporting the proposition of a "devotional service." This evidence consisted of testimony of an opening prayer and possibly a closing prayer and certain hymns. However, even the evidence in

our trial is very scanty on this issue and is basically limited to statements that there was an opening prayer and possibly a closing prayer and hymns. There is no evidence as to the extent, duration, or content of the prayer. Clearly a long and specific invocation of specific deities or historical religious persons could turn this seminar into a devotional service. However, a brief request of a general deity for attributes such as wisdom or courage would be less likely to make the seminar a devotional service. Similarly with hymns, some hymns may be identified with certain religious aspects or may contain very specific religious positions. Other hymns may be very generic and may in fact be part of the general music culture of society. Although the issue of whether the seminar was a devotional service was submitted to the jury, the Plaintiff has failed in this motion to show that any change in the evidence from the first trial is sufficient to make this seminar a devotional service.

III. WAIVER

It is important to note that the form of the questions and the directions to return a verdict after certain answers to Question No. 4 were agreed to by the Plaintiff and no objection was received when the verdict was returned.[4/] There had been earlier discussions relative to this issue. However, the questions submitted by the Plaintiff also presented the issue of conflict with personal religious beliefs. The Court understood that the entire format being submitted to the jury was agreeable to the parties. At the very least this would make any remaining issues a jury waived matter. See Mass. R. Civ. P. 49(a); Vellaca v. Uniroyal Tire Co., Inc., 36 Mass. App. Ct. 247 (1994). It could also result in a waiver of any position that attendance at a devotional service that did not conflict with personal religious beliefs was actionable.

4/ Once again this is the recollection of the Court without the benefit of the transcript.

IV. REQUIREMENT OF A CONFLICT WITH BONA FIDE PERSONAL RELIGIOUS BELIEFS.

Turning to the merits of Plaintiff's position a closer reading of the federal cases cited indicates that the language contained therein was premised on a conflict with bona fide religious beliefs. In Townley, supra, the Court stated that the Plaintiff must establish a prima facie case of religious discrimination and noted that the Plaintiff had met the burden. However, in footnote 5 the Court set forth the three part test to establish religious discrimination and stated

> The employee must show that
>
> (1) a bona fide religious belief of the employee conflicted with an employment policy,...

In our case Questions No. 2 and No. 4 were directed to this issue and the jury found that there was no conflict.

In Young, supra at 143, the Court stated

> In order to prevail in this lawsuit, Mrs. Young had to prove that she was discharged on account of her religious belief ....

The Court also stated that the only possible reason for her resignation was her resolution not to attend religious services which "were repugnant to he conscience." Young, supra at 144. Here it appears that the jury did not believe that the Plaintiff was discriminated against on account of her religious beliefs or because the seminar was repugnant to her conscience.

Kolodziej, supra, is on a different footing and states that an employer's requirement of

> attendance at devotional services at which prayer is offered would constitute unlawful compulsion to participate in religious activity.

The Court cited Townley and Young for that statement. It is important to note that the Supreme Judicial Court was deciding the case under General Laws, Chapter 12, Section 111 and under General Laws, Chapter 151B, Section 4. Since the Supreme Judicial Court was not deciding the case under Title VII of the Civil Rights Act of 1964 (42 U.S.C. 2000(e); and since both Townley and Young appear to based upon a bona fide religious belief having been made, the Court accepts Defendants' position that this is a requirement for recovery under the federal statute.

ORDER

Accordingly, it is Ordered that Plaintiff's Motion to Alter or Amend Judgment or, in the Alternative for a New Trial, be Denied.

_____
James P. Dohoney
Justice of the Superior Court

DATED: _____

APPENDIX C

(Charge to Jury on
Meaning of "Devotional Service")

The first questions is, "Did the defendants require the plaintiff to attend a devotional service?" And you'll note that I put devotional service in quotation marks there. Unfortunately, the statute that we're dealing with here does not define the words "devotional service" because the statute doesn't define the words or is not otherwise defined in the law. It means it's left to a common understanding and meaning. And you people as 14 collective people are ideally suited to bring a definition to that as 14 people with obviously varying backgrounds in the community, I suspect educational backgrounds and some different ages too, as I look around, so you bring a common need to those terms.

Let's me say to you, however, to be a devotional service, that there must be some religious content to the matter. However, let me also say to you, the fact that there is some religious content does not necessarily make something of devotional service. And I'd also say to you just because there's some content which is not religious, other parts of it, does not preclude it from being a devotional service.

Let me give you some examples, totally unrelated to this, ladies and gentlemen. It's my understanding that the Congress of the United States and indeed the Massachusetts legislature begin each session with some type of prayer probably by a clergyman. I don't think any of us would think that the deliberations of Congress of Massachusetts legislature are devotional services. So that would be an example of where -- as I say, some religious content but does not make it a religious service. that's what I mean by that, ladies and gentlemen.

I want you to consider all of the factors here in deciding whether it was a devotional service. You may consider the extent of the religious content of it. You may consider the nature of the religious content of the matter. You may consider the place in which it was held. I think counsel have argued certain things to you, but place is a factor. It may not be a determining factor, ladies and gentlemen.

By way of example, if for some reason a head of a major religion came and gave a very religious ceremony at Yankee Stadium, I'll say that could very well be a devotional service even though it was held in Yankee Stadium.

On the other hand, certainly there can be matters held in churches -- in my own life I recall that my son was made and Eagle scout. It was held in a church and it was not of my religion. But I didn't consider that a devotional service simply because it was held in a church. So place is a factor, but not a determining factor. It's one of the factors which you should consider.

So, basically, ladies and gentlemen, whether something is a devotional service is left to its common meaning. You people are ideally equipped to render judgment on that; and in doing so I want you to understand that there has to be some religious content before something can be a devotional service. But the mere fact that there is some religious content does not in and of itself make it a devotional service. Nor does the fact that it may have purposes and content totally unrelated to religion preclude it from being a devotional service.

Basically, consider the extent of a religious content, the nature of the religious content, the place itself, all of the circumstances in coming to a conclusion.

Now, let me just tell you then, with respect to that first question, ladies and gentlemen, the plaintiff has the burden of proving that the defendant did require here to attend a devotional service.

APPENDIX D

(Excerpts from Basic Seminar Workbook)

[Page 1]

HOW TO USE THIS WORKBOOK TO MAKE YOUR SEMINAR AND TEXTBOOK MORE EFFECTIVE

* This workbook is designed to facilitate note-taking during the Seminar and will lead you to a greater understanding of what is being taught. It contains all the necessary charts for you to fill in, as well as blank pages for extra notes. One of the most beneficial aids in this workbook is the list of scripture verses quoted or referenced to during the Seminar. We recommend that you look them up in your Bible and study them before each session. By using this time between sessions for extra study, you will gain a greater understanding of the material which will be presented during the sessions.

* After the evening session on Friday, you may exchange the card in the back of this workbook for your copy of the Basic Seminar Textbook. It is designed to be studied in conjunction with the many pages of notes which you will have taken during the Seminar.

* The workbook and the textbook (which you will receive on Friday) are intended to be "open ended," allowing for the deeply rewarding experience of searching for more truths from the inexhaustible pages of scripture.

* As there will be many notes to take during the week, we recommend that you bring additional notepaper with you to the sessions.

[Pages 2-6]

SCRIPTURE REFERENCES FOR THE SEMINAR

The Scripture references on these pages are quoted or indirectly referred to during the Seminar. They are the background for basic points and related insights. You are encouraged to study these verses before each session and after the Seminar is completed.

MONDAY

WISDOM AND UNDERSTANDING

Proverbs 4:7
Proverbs 9:10
Proverbs 14:12
Proverbs 28:26
James 1:5
James 3:17-18
I Corinthians 8:1
Psalm 50:15
Revelation 1:17
II Chronicles 16:9
Jeremiah 29:13

DISCERNING LEVELS OF CONFLICT

John 8:32
Titus 3:9-10
Matthew 6:25-28
Deuteronomy 31:8
Exodus 34:14
Hebrews 13:8
Isaiah 40:8
II Corinthians 4:18
Romans 1:29-31
Colossians 3:5-9
Galatians 5:19-21
Hebrews 12:15-17
I John 4:8
John 3:16
I Peter 5:6
Philippians 2:13
Titus 2:11-14
Ephesians 2:8-9
II Peter 3:18
I Corinthians 15:10
Romans 11:6
James 4:6-8
Hebrews 12:15-17
Genesis 25:29-34
Acts 8:9-23
Proverbs 2:4-5
Isaiah 55:8-9
Proverbs 14:12
Proverbs 3:5
1 Corinthians 1:18-27
Luke 6:38
I Peter 5:5
Proverbs 15:33
Matthew 10:39
Matthew 20:26-27
Psalm 76:11
Ecclesiastes 5:4-5
Exodus 20:12
Romans 6:14
I Timothy 3:3
Matthew 6:25-29
Proverbs 10:24
John 3:25

Exodus 20:5
Hebrews 12:15-17
Matthew 16:25

RESPONDING TO ENEMIES

Proverbs 16:7
Proverbs 18:17
I Corinthians 11:31
Proverbs 16:2
Romans 12:15-21
Galatians 6:1-2
Romans 2:4
Luke 6:35
Psalm 73.3-19
Matthew 5:45
Galatians 6:7
Proverbs 24:17-18
Romans 12:20-21
Matthew 7:2
Romans 8:37
Proverbs 16:25
Matthew 23:11

BASIC STEPS OF MATURITY

II Timothy 3:16-17
Exodus 15:26
Deuteronomy 15:6
Deuteronomy 4:6
Deuteronomy 28
Proverbs 2:4-5
Psalm 19:7
Psalm 8:8
Leviticus 19:29
Ecclesiastes 8:11
Romans 1:28
II Corinthians 10:5
Matthew 12:36
Romans 2:6
I Peter 3:10
Jeremiah 17:10
Galatians 5:13
Proverbs 6:23
Hebrews 12:6
Proverbs 1:23
I Corinthians 10:13
Psalm 119:105
II Peter 1:20
Exodus 20:15
I Timothy 5:18
I Corinthians 9:9
Deuteronomy 25:4
Leviticus 19:19
Deuteronomy 22:11
Exodus 23:19
Colossians 1:28-29
John 17:17
II Corinthians 5:10
John 8:32

ACCEPTANCE OF GOD'S DESIGN

Malachi 4:6
I John 4:20
Ephesians 5:29
Matthew 22:39
Romans 7:18
Psalm 139:14-16
Jeremiah 17:9
Genesis 1:27
Isaiah 45:9-10
Romans 9:20-21
Ephesians 5:29
Ephesians 2:10
Psalm 138:8
Philippians 1:6
II Corinthians 10:17-18
II Corinthians 10:12
Proverbs 31:30
I Corinthians 1:26-31
Psalm 68:5
Daniel 1:3, 6
Genesis 37:28
Exodus 2:10
I Samuel 1:27
Esther 2:7
James 2:5
John 1:46
Hebrews 4:15
Isaiah 53:2
I Samuel 16:7

Genesis 3:1
Romans 8:29
Galatians 4:19
Matthew 5:3-12
II Chronicles 26:5
Matthew 6:33
Psalm 17:15
II Corinthians 4:10-17
II Corinthians 12:6-10
Hebrews 5:13-14
Colossians 1:27
Hebrews 7:9-10
Exodus 20:5
Jeremiah 14:20
Romans 5:12
II Corinthians 5:17
Romans 6
Romans 8:34
Romans 12:6-8
Philippians 4:1
II Corinthians 3:2
Exodus 4:10-12
Matthew 5:16
James 5:13-15
Hebrews 9:27
Psalm 90:10
II Kings 13:14-21
I Corinthians 11:28-33
John 9:2-3
Galatians 6:17
I Corinthians 6:19-20

Mark 10:44
Isaiah 61:2-3
Joel 2:25
I Timothy 1:5
Matthew 23:11
Acts 17:26-27
Psalm 127:3
John 11:4
I John 5:16-17
Ephesians 3:20

TUESDAY

ABNORMAL SOCIAL DEVELOP-MENTS

James 3:13-18
Proverbs 17:6
I Corinthians 16:13-14
Psalm 15:4-5
Philippians 2:13
Hebrews 12:15
Proverbs 6:2-5
Isaiah 55:8-9
Proverbs 15:33
Proverbs 13:10
II Timothy 3:2-5
Proverbs 18:19
I Samuel 15:23
Proverbs 13:10
Isaiah 14:12-14
I Corinthians 10:13

Mark 3:27
Matthew 6:13
Proverbs 22:8
Matthew 6:24
Ephesians 5:21-25
I Peter 5:8
Colossians 3:21
Philippians 3:19
Proverbs 14:9
I Corinthians 15:33
Proverbs 13:20
Proverbs 30:17
I Peter 5:5
Philippians 1:10
Psalm 90:12
Matthew 24:35
Proverbs 11:30
Galatians 5:22-23
Romans 6:23
Philippians 3:10
Proverbs 3:5-6
I John 5:12-13
I Corinthians 11:1
Romans 7:8
Colossians 3:5
Galatians 5:19-21
Ephesians 4:19
Romans 1:26-29
I Thessalonians 4:6
Romans 2:15
Romans 2:1-3
II Corinthians 10:5
Galatians 6:7-8

Psalm 19:7-9
Deuteronomy 28
Exodus 20:1-17
Psalm 103:2-4
John 15:3
Psalm 119:11
Psalm 23:3
Colossians 2:8
John 8:32
Romans 6:14
James 4:7
Romans 6:23
Isaiah 47:13-14
Deuteronomy 4:19
Exodus 20:5
II Corinthians 11:14
Matthew 24:24
I John 1:9
Revelation 12:11
Jude 9
Hebrews 9:27
Proverbs 14:12-13
Romans 1:21
John 8:32
Jeremiah 29:13
Psalm 34:14
Romans 12:18
Proverbs 18:17
Philemon
John 3:1-8, 16
Isaiah 40:8
Romans 1:28
I Corinthians 7:5
Romans 1:24
Proverbs 18:14
Leviticus 19:29
James 1:5

DISCERNING GOD'S GUIDANCE

II Samuel 24:24
Job 1:1-22
II Corinthians 6:14
I Peter 5:8
James 1:14
Proverbs 14:15
I Corinthians 13:4-8
Proverbs 16:7
Proverbs 23:22
I Corinthians 13:4-8
Proverbs 16:7
I Corinthians 13:4-8
Proverbs 23:22
Proverbs 6:20-22
I Samuel 16:14-15
Colossians 1:27
Romans 8:28-29
Proverbs 22:15
Matthew 3:17
Proverbs 21:1
Romans 5:3-5
Proverbs 17:11
Proverbs 29:1
Proverbs 30:17
II Chronicles 3:1-4:22
II Kings 24:1-25:21
I Corinthians 6:19-20
Jeremiah 29:10-14
Ezra 3:12-13
Haggai 2:3-9
Luke 19:47
Joel 2:25
Isaiah 61:3
I Peter 2:13
Romans 10:9-13
I John 1:9
John 16:13
John 14:6
I Peter 2:18-3:10
Isaiah 55:8
Philippians 4:7
Psalm 119:99

Hebrews 12:6-11
Genesis 37:3
Genesis 50:20

BASIC STRUCTURES OF AUTHORITY-FAMILY

Colossians 3:20

Ephesians 6:1-3
Proverbs 23:22
Proverbs 6:20-22
Proverbs 30:17
Proverbs 15:5
Matthew 15:1-9
I Timothy 5:8

BASIC STRUCTURES OF AUTHORITY-GOVERNMENT

I Peter 2:13-14
Romans 13:1-7

BASIC STRUCTURES OF AUTHORITY-CHURCH

I Thessalonians 5:12-13
Hebrews 13:7, 17
I Timothy 5:17-18
I Peter 5:1-3

FOUR ESSENTIAL ATTITUDES

I Peter 3:1-6
Ephesians 5:23
I Timothy 2:5
Ephesians 5:21-33
I Corinthians 11:13
Proverbs 31:10-31
I Corinthians 16:13-14
I Timothy 5:8
Matthew 24:12
Luke 2:52
Psalm 80:6

REVERENCE

I Peter 2:13-14
Romans 13:4, 6
Acts 23:1-5
Esther 4:10-7:10
Matthew 2:12-23
I Samuel 24:6
Hebrews 5:8
Esther 2:21-23
Proverbs 31:28-31

GRATEFULNESS

Psalm 62:5
I Peter 3:5-6
Deuteronomy 6:10-12

SERVANT

Mark 10:44
Genesis 39:1-6
Ephesians 5:25-27
Philippians 2:6-9

QUIET

I Peter 3:3-6
Matthew 27:19
Genesis 2:24
Proverbs 14:1
Matthew 6:24
Ephesians 5:31
II Timothy 1:7
I Peter 5:8
Philippians 4:6-8
James 1:27
Philippians 1:21
Psalm 86:1-7; 55:17
Psalm 61:1-2
Psalm 76:10
John 19:11
I John 4:16-19
Psalm 25:1-2
Romans 13:1-4

WEDNESDAY

AUTHORITY

Hebrews 11:6
Matthew 8:5-10
Ephesians 5:22
I Peter 2:13-14
Romans 13:1-7

I Peter 5:5
Deuteronomy 17:18-19
II Corinthians 10:4
Hebrews 10:17
Galatians 1:8
Daniel 6:7-9
Daniel 9:23
Proverbs 16:7
Proverbs 21:1
Habakkuk 1:1-13
Psalm 76:10
Ephesians 5:22-24
Titus 2:5
I Peter 3:1-2, 5
Proverbs 14:12
Luke 2:51, 52
Ephesians 6:1-2, 5
Daniel 9:20
Proverbs 11:14
Philippians 2:5-8
Daniel 1:10
II Timothy 3:6
I Peter 3:1-6
I Corinthians 10:13
Matthew 6:13
Proverbs 30:17
Daniel 1:8
Malachi 4:6
Deuteronomy 6:4-9
Acts 2:42
Proverbs 1:3
Daniel 1:8-15
Matthew 6:9-10
Hebrews 13:7, 17
I Timothy 5:1-2
Daniel 1:16
Exodus 5:1-6:1
Exodus 12:35-36
Psalm 105:37
Matthew 20:16
Daniel 6:10-24
Matthew 10:32-39
Acts 4:19; 5:29
Matthew 13:31
Hebrews 10:19-22
Romans 10:17
James 1:1
John 19:11
Romans 8:37
Galatians 4:1-2
Jeremiah 32:27
Matthew 22:14
Luke 2:49
Luke 3:23
Psalm 1:3
I Thessalonians 5:12
Exodus 20:5
Romans 5:12-19
Hebrews 10:25
Exodus 7:16
II Peter 1:10
I Corinthians 8:1

RESOLVING FAMILY CONFLICTS-CLEARING OUR CONSCIENCE

I Thessalonians 2:11
Genesis 25:26
Luke 15:11-32
John 20:24-29
Genesis 2:24
Deuteronomy 5:9-10
Exodus 34:7
Ephesians 6:1-3
Matthew 5:9
Romans 2:1-3
James 1:23-25
John 14:6
Acts 9:2
Matthew 12:36
II Corinthians 5:10
Jeremiah 17:10
I Peter 3:10
I Samuel 18:20-21
Colossians 2:8-10
I Timothy 1:18-19
Philippians 3:4-14
Acts 24:16
II Corinthians 1:12
I Peter 3:15-17
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